

Page 12 - Surface Storage

Our first preference is for no In-Delta storage because of the unavoidable adverse impacts. Otherwise, the following changes should be made at a minimum:

ADD TO FIRST PARAGRAPH: ", all of which may depend on the same water supplies and may therefore compete with one another."

AMEND (i) as follows:

"(i) In-Delta storage project (approximately 250 TAF). An in-Delta storage facility might provide both fishery benefits and enhanced water project flexibility, but also raises seepage and levee stability concerns to adjacent lands, water temperature and quality concerns, and concerns about avoidable losses of prime agricultural lands and resulting economic impacts. Projected yields might be significantly impacted by necessary mitigation measures. Study of this concept must satisfactorily resolve these concerns, and a decision to proceed must be approved by the Delta Protection Commission, the water agency and County in which the project is located."

Page 17 - Conveyance

ADD TO FIRST PARAGRAPH:

"Opportunities to increase export pumping usually occur at times when there is less demand for exported water supplies and insufficient storage capacity. Therefore, increases in export pumping must be linked to increases in storage capacity to insure that increased export capacity does not aggravate competition for water supplies during periods when existing supplies are already over-committed."

Pages 19 - 20 Screened through-Delta facility on the Sacramento River of up to 4,000 cfs

The recent change in language to broaden this evaluation has not had the intended result at CalFed staff level. Consequently, the language should be more specific about considering sites other than Hood, including sites below the Delta Cross Channel, and screening the Delta Cross Channel, in whole or in part.

Pages 21-22 - Environmental Water Account and ESA Commitments

The repeated phrase "without reducing deliveries to water users" seems to preclude purchases of water for the EWA from any export user, an undesirable result. Such purchases, which could result in a reduction in Delta exports, might be the most beneficial to the fishery and to water quality and should not be precluded. A program to link public investment in Water Use Efficiency and Conservation with reductions in exports is, in our view, necessary to solve long term issues within the context of the CalFed Solution Principles.

Page 28 - Water Quality

In the first full paragraph there is a reference to CalFed's current drinking water targets (30 ug/L bromide and 3.0 mg/L total organic carbon). These targets are currently under review by the Delta Drinking Water Council based on study efforts by USEPA and others, are likely to be modified, and shouldn't be "cemented" into this document or the forthcoming Record of Decision.

Appendix D

The Delta and other areas of origin should have priority over exports as required by law. The no net loss and regulatory certainty should apply to the Delta and other area of origin users and to Delta water quality and water levels.

Appendix I

The State Water Resources Control Board should not be a part of CalFed because of its adjudicatory responsibilities.